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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JACQUELINE NAVARRO,) Case No.: 1:24-cv-01193-BAM
Plaintiff,)
vs.) STIPULATION AND {PROPOSED} ORDER
COMMISSIONER OF SOCIAL SECURITY,) FOR AN EXTENSION OF TIME
Defendant.)

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty (20) days from February 26, 2025, up to and including March 18, 2025. This is the Defendant's first extension request.

Defendant requests this extension in order to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case along with several other cases, and now has five cases due in the week of February 26, 2025. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is

1 made in good faith and with no intention to unduly delay the proceedings, and counsel
2 apologizes for any inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 NEWEL LAW

7 Dated: February 12, 2025

/s/ *Melissa Newel**
(*as authorized via e-mail)
MELISSA NEWEL
Attorney for Plaintiff

10 Dated: February 12, 2025

MICHELE BECKWITH
United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

11 By: /s/ *Michelle A. Pavelek*
MICHELLE A. PAVELEK
Special Assistant U.S. Attorney
12 Attorneys for Defendant

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14 **ORDER**

15 Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an
16 extension, up to and including March 18, 2025, to respond to Plaintiff's Brief and Plaintiff's
17 optional reply brief will be extended to April 1, 2025.

18 IT IS SO ORDERED.

19 Dated: February 18, 2025

20 /s/ *Barbara A. McAuliffe*

21 UNITED STATES MAGISTRATE JUDGE